UNITED STATES DISTRICT COUF SOUTHERN DISTRICT OF NEW Y		
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UNITED STATES OF AMERICA v.		Affirmation in Support of Application for Order of Continuance 20 Mag. 983
MILESH TALREJA,		
Defendant.		
State of New York)	
County of New York	: ss.:	
Southern District of New York)	

Alexander Li, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

- 1. I am an Assistant United States Attorney in the Office of Geoffrey Berman, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. §3161(h)(7)(A).
- 2. The defendant was charged in a complaint dated January 28, 2020, with a violation of 18 U.S.C. § 1344 (bank fraud). The defendant was arrested on February 5, 2020, and was presented before Magistrate Judge Sarah Netburn on the same date. The defendant was represented by Alisha McCarthy, Esq. and ordered detained.
- 3. At the initial presentment, defense counsel consented to a waiver of her client's right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until March 6, 2020 within which to file an indictment or information.

4. Defense counsel and I have had discussions regarding a possible disposition of this case

beginning on February 5, 2020 and continuing to as recently as February 27, 2020. The

negotiations have not been completed and we plan to continue our discussions, but do not

anticipate a resolution before the deadline under the Speedy Trial Act expires on March 6, 2020.

5. Therefore, the Government is requesting a 30-day continuance until April 6, 2020, to

continue the foregoing discussions and reach a disposition of this matter. On February 26, 2020,

I personally exchanged emails with defense counsel Ilene Jaroslaw, Esq., who specifically

consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested

continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
February 26, 2020

Alexander Li

Assistant United States Attorney

212-637-2265